

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

“JANE DOE”, a pseudonym	:	
	:	
Plaintiff,	:	
	:	C.A. No. 20-00212-SPB
vs.	:	
	:	
ALLEGHENY COLLEGE	:	
	:	
Defendant.	:	

ORDER

AND NOW, this _____ day of _____, 2021, upon consideration of Plaintiff’s Motion to Compel Nonparty Corsica River Mental Health Services, Inc. to Comply with Subpoena, and any responses thereto, **IT IS HEREBY ORDERED** that Plaintiff’s Motion is **GRANTED**.

It is **FURTHER ORDERED** that Corsica River Mental Health Services shall produce any and all documents, therapist notes, reports, memorandums, intake/assessment records, attendance records, psychiatric evaluations, psychiatrist progress notes, evaluations, tests, etc. generated by any Corsica River Mental Health Service employee concerning Jane Doe including but not limited to any and all documents, therapist notes, reports, memorandums, intake/assessment records, attendance records, psychiatric evaluations, psychiatrist progress notes, evaluations, tests, etc., generated on July 27, 2015; August 5, 17, and 31, 2015; September 14 and 30, 2015; October 12, 13, and 26, 2015; November 9, 2015; December 3 and 21, 2015; January 5 and 26, 2016; February 11, 2016; March 28, 2016; April 11 and 25, 2016; May 18, 2016; June 1, 17, and 20, 2016; July 18, 2016; August 8 and 29, 2016; September 12 and 26, 2016; October 10 and 24, 2016; December 6, 19, and 27, 2016; January 10, 2017; February 9, 2017; March 1 and 21, 2017; April 5, 2017; December 13, 2017; January 18, 2018; February 19, 2018; March 28, 2018; April 24, 2018;

May 4 and 30, 2018; June 15, 2018; July 19, 2018; and August 16, 2018.

BY THE COURT:

SUSAN PARADISE BAXTER
United States District Judge

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Plaintiff,	:	
	:	C.A. No. 20-00212-SPB
vs.	:	
	:	
ALLEGHENY COLLEGE	:	
	:	
Defendant.	:	

**PLAINTIFF’S MOTION TO COMPEL NONPARTY CORSICA
RIVER MENTAL HEALTH SERVICES, INC. TO COMPLY WITH SUBPOENA**

Plaintiff, by and through her undersigned counsel, hereby moves this Honorable Court pursuant to Fed. R. Civ. P. 37 and 45 to compel nonparty Corsica River Mental Health Services, Inc., doing business as Corsica River Mental Health Services (hereinafter “Corsica”), to comply with Plaintiff’s subpoena to produce documents that Plaintiff’s counsel served on June 24, 2021.

Exhibit A.

On May 5, 2021, Plaintiff requested a copy of Jane Doe’s Corsica medical and billing records from January 2015 to present, enclosing an “Authorization for Release of Health Information” and a Corsica-specific “Request for Access/Release of Client Information,” both executed by Jane Doe. **Exhibit B.**

On May 19, 2021, Corsica provided some, but not all of Jane Doe’s records. Plaintiff’s counsel has placed multiple calls to Corsica to resolve any issues concerning the remaining records, to no avail.

On July 8, 2021, Plaintiff sent a letter to Corsica again requesting the records. **Exhibit C.**

To date, Corsica has failed to produce the entirety of the requested records. Without these records, Plaintiff is unduly prejudiced in her ability to identify witnesses; prepare for depositions;

and otherwise resolve this case through settlement or trial without complete responses to the above-described discovery request.

Wherefore, Plaintiff respectfully requests that this Honorable Court enter an Order in the form attached hereto, compelling Corsica River Mental Health Services, Inc., doing business as Corsica River Mental Health Services, to comply with Plaintiff's subpoena served June 24, 2021. Respectfully submitted this 20th day of July 2021.

KLINE & SPECTER, P.C.

BY: /s/ Eleanor O. Aldous
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this date, a true and correct copy of Plaintiff's Motion to Compel Nonparty Corsica River Mental Health Services to Comply with Subpoena was served via e-mail upon all counsel and/or pro se parties of record.

KLINE & SPECTER, P.C.

By: /s/ Eleanor O. Aldous, Esquire
ELEANOR O. ALDOUS, ESQUIRE
Attorney for the Plaintiff

Dated: July 20, 2021